Reporting Forms and Directions for Submitting Data for Consumer Products Containing Perchloroethylene as Required by Section 94513(e) of the Regulation for Reducing Volatile Organic Compound Emissions from Consumer Products

<u>Please read all the instructions prior to completing the reporting forms</u>. If you have any questions, please do not hesitate to call Ms. Dodie Weiner, Air Pollution Specialist, at (916) 322-2362, or

Ms. Melinda Weaver, Air Resources Technician, at (916) 327-0647.

Pages 3-5 contain hypothetical examples and demonstrate how information should be entered into the reporting forms. These pages serve as examples and do <u>not</u> need to be submitted.

Please submit completed reporting forms no later than March 1, 1998, to:

California Air Resources Board Stationary Source Division Air Quality Measures Branch P.O. Box 2815 Sacramento, California 95812 Attention: Carla Takemoto - Perc Reporting

Please complete the enclosed reporting forms for all consumer products containing at least 1.0 percent perchloroethylene that you sell in California. The reporting forms consist of:

- 1. One Company Information Form
- **2. Perchloroethylene Reporting Form** (Copy additional forms as necessary.)
- 3. One Confidential Information Submittal Form

Instructions for completing the Perchloroethylene Reporting Forms

Clearly indicate which data you are submitting by checking the box next to one of the three requirements listed.

1. **Item Number**. Please assign one number to each product. Number products consecutively.

- 2. **Product Brand Name**. List the product name of each product exactly as it appears on the principal display panel of your product. Products based on the same formulation may be aggregated if the <u>product formulation</u> is <u>identical</u> except for the coloring;
- 3. **Product Category**. Indicate product categories as defined in section 94508(a) of the Consumer Product Regulation.
- 4. **Product form.** Indicate product form, using "A" for aerosols, "L" for liquid, "S" for solids, "P" for pumps, or "O" for others. *If your product falls into the category of "others," briefly describe the dispensing form of this particular product under the comments section of the reporting form (e.g. gel, cream).*
- 5. **Weight percent.** The weight of perchloroethylene, to the nearest 0.1 percent, as a percent of the net product weight, i.e. excluding container and packaging weight.

percent by weight =
$$\underline{(X)}_{(Y_p)} \times 100$$

where: X = weight of perchloroethylene in product, and

Y_p = net weight of product (including propellant but excluding container and packaging)

6. **Product sales in California**. Calculate the amount of product sold by multiplying the weight of each product unit (excluding container and packaging) times the number of units sold:

Product unit weight (pounds) x units sold in CA per year = total amount sold in CA per year.

If sales data specific to California are not available, you may apportion your total sales based on the estimated proportion of your sales that occur in California. Use 1996 calendar year for the California sales. Indicate the amount sold in pounds. *Please do not use fluid ounces*.

Comments. Any additional information you would like to add; if your product falls into the category of "others," briefly describe the dispensing form of this particular product under this Comments section. Ensure the Item Number you assigned to the product in Block 1 is the same Item Number in the Comments section for each product.

COMPANY INFORMATION FORM

CALIFORNIA AIR RESOURCES BOARD

PERCHLOROETHYLENE REPORTING FORMS

Please fill out the requested information about your company. Provide us with the complete company name and mailing address. Identify a contact person, specify this person's title, and provide his or her phone and FAX number. This sheet needs to be completed only once for each company and should be attached to the product information forms upon submittal.

Company name: Smith-Meyer

Address:	3030 Circle Drive		
City, State, ZIP: Anytown, CA 92345			
Contact person:	Jane Doe		
Title: Director of Research and Development			
Phone: (123) 456	j-7890	FAX: None Available	
	rmation?: _X_ (yes) (no) product labels included for yo _Be sure each label include		
	For ARB Us	se Only	
Date received:		Log #:	
ARB comments	:		

Perchloroethylene Reporting Form for (indicate one)

9 1996 Baseline

: 1997 New Products

9 1997 usage and sales

Company: Smith-Meyer Page 1 of 1

(1) Item No.	Product Brand Name	(3) Product Category	(4) Product Form: Aerosol (A) Pump (P) Liquid (L) Solid (S) Other (O)	(5) Weight Percentage to nearest 0.1% of perc.	(6) Total California Product sales rounded to nearest pound
1	Sparkling Engine Degreaser	Engine Degreaser	A	3.5%	25045
Itam Na	Itam No.				

Item No.	Comments:

CONFIDENTIAL INFORMATION SUBMITTAL FORM

(If you wish to designate any information contained in your reporting data as confidential, please provide the data requested below and return with your reporting forms.)

In accordance with Title 17, California Code of Regulations (CCR), Section 91000 to 91022, and the California Public Records Act (Government code Section 6250 et seq.), the information that a company provides to the Air Resources Board (ARB) may be released (1) to the public upon request, except trade secrets which are not emissions data or other information which is exempt from disclosure or the disclosure of which is prohibited by law, and (2) to the Federal Environmental Protection Agency (EPA), which protects trade secrets as provided in Section 114© of the Clean Air Act and amendments thereto (42 USC 7401 et seq.) and in federal regulation, and (3) to other public agencies provided that those agencies preserve the protections afforded information which is identified as a trade secret, or otherwise exempt from disclosure by law (Section 39660(e)).

Trade secrets as defined in Government Code Section 6254.7 are not public records and therefore will not be released to the public. However, the California Public Records Act provides that air pollution emission data are always public records, even if the data come within the definition of trade secrets. On the other hand, the information used to calculate information is a trade secret.

If any company believes that any of the information it may provide is a trade secret or otherwise exempt from disclosure under any other provision of law, it must identify the confidential information as such at the time of submission to the ARB and must provide the name, address, and telephone number of the individual to be consulted if the ARB receives a request for disclosure or seeks to disclose the data claimed to be confidential. The ARB may ask the company to provide documentation of its claim of trade secret or exemption at a later date. Data identified as confidential will not be disclosed unless the ARB determines, in accordance with the above referenced regulations, that the data do not qualify for a legal exemption from disclosure. The regulations establish substantial safeguards before any such disclosure.

In accordance with the provisions of Title 17, California Code of Regulations, Section 91000 to 91022, and the California Public Records Act (Government Code Sections 6250 et seq.),

Company Name L Smith-Meyer

declares that all the information submitted in response to the California Air Resources Board's Perchloroethylene Reporting Requirements is confidential "trade secret" information, and requests that it be protected as such from the public disclosure. All inquiries pertaining to the confidentiality of this information should be directed to the following person:

Date:	Mailing Address: Ms. Jane Doe
(Signature)	Director, Research and Development
(Printed Name) Ms. Jane Doe	Smith-Meyer
(Title) Director, Research and Development	3030 Circle Drive
(Telephone Number) (123) 456-7890	Anytown, CA 92345

COMPANY INFORMATION FORM

CALIFORNIA AIR RESOURCES BOARD

PERCHLOROETHYLENE REPORTING FORMS

Please fill out the requested information about your company. Provide us with the complete company name and mailing address. Identify a contact person, specify this person's title, and provide his or her phone and FAX number. This sheet needs to be completed only once for each company and should be attached to the product information forms upon submittal.

Company name:				
Address:				
City, State, ZIP:				
Contact person:				
Title:				
Phone:	FAX:			
Confidential information?: (yes) (no)				
Total number of product labels included f	For your company =			
Be sure each l	abel includes legible usage instructions .			
For AR	RB Use Only			
Date received:	Log #:			
ARB comments:	•			

Perchlorone) Company	oethylene Reporting Form	9 9	1996 Baseline 1997 New Products 1997 usage and sale		Page of
(1) Item No.	(2) Product Brand Name	(3) Product Category	(4) Product Form: Aerosol (A) Pump (P) Liquid (L) Solid (S) Other (O)	(5) Weight Percentage to nearest 0.1% of perc.	(6) Total California Product sales rounded to nearest pound

Item No.	Comments:	

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Company Name L	
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Date:	Mailing Address:
(Signature)	
(Printed Name)	
(Title)	
(Telephone Number)	